

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

In re:

USA GYMNASTICS,<sup>1</sup>

Debtor.

Chapter 11

Case No. 18-9108-RLM-11

**NOTICE OF FRANKGECKER LLP'S STATEMENT FOR SERVICES RENDERED  
AND EXPENSES INCURRED FROM MAY 28, 2019 THROUGH JUNE 30, 2019**

PLEASE TAKE NOTICE that on July 18, 2019, FrankGecker LLP, as counsel to Fred C. Caruso, not individually, but as Future Claimants' Representative in this case, submitted its invoice for fees and expenses incurred between May 28, 2019 and June 30, 2019 (the "Invoice"), in accordance with the *Order Granting Debtor's Motion for Entry of Order Establishing Procedures for Interim Compensation and Reimbursement of Professionals* [Dkt. 187] (the "Interim Compensation Order").

PLEASE TAKE FURTHER NOTICE that the Invoice, attached hereto as Exhibit A, seeks compensation for \$43,287.50 in fees and \$235.10 in expenses.

PLEASE TAKE FURTHER NOTICE that any objections to the Invoice must be filed and served upon the undersigned counsel by August 1, 2019 at 4:00 p.m. (prevailing Eastern Time) in accordance with the Interim Compensation Order.

PLEASE TAKE FURTHER NOTICE that, if no objection is timely filed, the Debtor shall promptly pay 80% of the fees and 100% of the expenses identified in the Invoice, subject to final approval by the Court at a future hearing.

---

<sup>1</sup> The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

Dated: July 18, 2019

Respectfully submitted,

**FRANKGECKER LLP**

By: /s/ Micah R. Krohn

Frances Gecker (*admitted pro hac vice*)  
Micah R. Krohn (*admitted pro hac vice*)  
FrankGecker LLP  
1327 W. Washington Blvd., Ste. 5G-h  
Chicago, Illinois 60607  
(312) 276-1400  
[fgecker@fgllp.com](mailto:fgecker@fgllp.com)  
[mkrohn@fgllp.com](mailto:mkrohn@fgllp.com)

*Counsel to Fred C. Caruso, not individually,  
but as Future Claimants' Representative*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2019 a copy of the foregoing *Notice of FrankGecker LLP's Statement for Services Rendered from May 28, 2019 through June 30, 2019* was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

Nancy D Adams ndadams@mintz.com  
Annemarie C Alonso annie@sllawfirm.com  
Steven Baldwin sbaldwin@psrb.com, rmatthews@psrb.com  
Martin Beeler mbeeler@cov.com  
Daniel D. Bobilya dan@b-blegal.com, sarah@b-blegal.com  
Megan A Bonanni mbonanni@pittlawpc.com  
Tonya J. Bond tbond@psrb.com, jscobee@psrb.com  
Wendy D Brewer wbrewer@fmdlegal.com, cbellner@fmdlegal.com  
Kenneth H. Brown kbrown@pszjlaw.com  
Charles D. Bullock cbullock@sbplclaw.com, lhaas@sbplclaw.com  
George Calhoun george@ifrahlaw.com, Heather.Simpson@kennedyseckman.com  
Douglas N. Candeub dcandeub@morrisjames.com  
John Cannizzaro john.cannizzaro@icemiller.com, Thyrza.Skofield@icemiller.com  
Deborah Caruso dcaruso@rubin-levin.net, dwright@rubin-levin.net; jkrichbaum@rubin-levin.net; atty\_dcaruso@bluestylus.com  
Dianne Coffino dcoffino@cov.com  
Jesse Max Creed creed@psb.law, alegría@psb.law  
Alex Cunny acunny@manlystewart.com  
Edward DeVries edward.devries@wilsonelser.com  
Karen M Dixon kdixon@skarzynski.com

Kimberly A. Dougherty kim.dougherty@andruswagstaff.com, sandra.martin@andruswagstaff.com  
Laura A DuVall Laura.Duvall@usdoj.gov, Catherine.henderson@usdoj.gov  
Jeffrey B. Fecht jfecht@rbelaw.com, rmcclintic@rbelaw.com  
Sarah Lynn Fowler sarah.fowler@mbcblaw.com, deidre.gastenveld@mbcblaw.com  
Eric D Freed efreed@cozen.com, mmerola@cozen.com  
Frances Gecker fgecker@fgllp.com, csmith@fgllp.com;csucic@fgllp.com;mmatlock@fgllp.com  
Cameron Getto cgetto@zacfirm.com  
Steven W Golden sgolden@pszjlaw.com  
Douglas Gooding dgooding@choate.com  
Gregory Michael Gotwald ggotwald@psrb.com, scox@psrb.com  
Manvir Singh Grewal mgrewal@4grewal.com  
Susan N Gummow sgummow@fgppr.com, bcastillo@fgppr.com  
Katherine Hance khance@goodwin.com  
Jeffrey M. Hester jhester@hbkfirm.com, mhetser@hbkfirm.com  
Samuel D. Hodson shodson@taftlaw.com, aolave@taftlaw.com  
Jeffrey A Hokanson jeff.hokanson@icemiller.com, bgnotices@icemiller.com  
John R. Humphrey jhumphrey@taftlaw.com, aolave@taftlaw.com  
Cassandra Jones cjones@walkerwilcox.com,  
vthosek@wwmlawyers.com;docket@walkerwilcox.com  
Bruce L. Kamplain bkamplain@ncs-law.com, dhert@ncs-law.com;klong@ncs-law.com  
Kevin P Kamraczewski kevin@kevinklaw.com  
Ronald David Kent ronald.kent@dentons.com  
Adam L. Kochenderfer akochenderfer@wolfsonbolton.com  
Christopher Kozak ckozak@psrb.com  
Micah R Krohn mkrohn@fgllp.com, mmatlock@fgllp.com;csmith@fgllp.com;csucic@fgllp.com  
Carl N. Kunz ckunz@morrisjames.com, jdawson@morrisjames.com  
Cynthia Lasher clasher@ncs-law.com, dcouch@ncs-law.com;dhert@ncs-law.com  
Adam Le Berthon adam.leberthon@wilsonelser.com  
Martha R. Lehman mlehman@salawus.com,  
marthalehman87@gmail.com;pdidandeh@salawus.com;lengle@salawus.com  
Jonathan C Little jon@sllawfirm.com  
Michael M. Marick mmarick@skarzynski.com  
Jonathan Marshall jmarshall@choate.com  
Phillip Alan Martin pmartin@fmdlegal.com, cbellner@fmhd.com  
John McDonald jmcdonald@briggs.com  
Mathilda S. McGee-Tubb msmcgee-tubb@mintz.com  
Harley K Means hkm@kgrlaw.com, kwhigham@kgrlaw.com;cjs@kgrlaw.com  
Geoffrey M. Miller geoffrey.miller@dentons.com, ndil\_ecf@dentons.com  
Robert Millner robert.millner@dentons.com, ndil\_ecf@dentons.com  
James P Moloy jmolley@boselaw.com, dlingenfelter@boselaw.com;mwakefield@boselaw.com  
Ronald J. Moore Ronald.Moore@usdoj.gov  
Whitney L Mosby wmosby@bgdlegal.com, fwolfe@bgdlegal.com  
Joel H. Norton jnorton@rsslawoffices.com  
Michael P. O'Neil moneil@taftlaw.com, aolave@taftlaw.com  
Weston Erick Overturf wes.overturf@mbcblaw.com,  
deidre.gastenveld@mbcblaw.com;ellen.sauter@mbcblaw.com  
Dean Panos dpanos@jenner.com  
Stephen Jay Peters speters@kgrlaw.com, acooper@kgrlaw.com  
Ginny L. Peterson gpeterson@k-glaw.com, acoy@k-glaw.com

John Thomas Piggins pigginsj@millerjohnson.com, ecfpigginsj@millerjohnson.com  
Michael L Pitt mpitt@pittlawpc.com  
George Plews gplews@psrb.com  
Amanda Koziura Quick amanda.quick@atg.in.gov, Marie.Baker@atg.in.gov  
Michael L. Ralph mralph@rsslawoffices.com  
Abigail E. Rocap arocap@batescarey.com  
Melissa M. Root mroot@jenner.com, wwilliams@jenner.com  
James Pio Ruggeri jruggeri@goodwin.com  
Syed Ali Saeed ali@sllawfirm.com, betty@sllawfirm.com  
Ilan D Scharf ischarf@pszjlaw.com  
Thomas C Scherer tscherer@bgdlegal.com, fwolfe@bgdlegal.com  
David J. Schwab djschwab@rsslawoffices.com  
Igor Shleypak ishleypak@fgppr.com, jfecteau@fgppr.com  
Casey Ray Stafford cstafford@k-glaw.com, lsmith@k-glaw.com  
James I. Stang jstang@pszjlaw.com  
Catherine L. Steege csteäge@jenner.com, mhinds@jenner.com;thooker@jenner.com  
Laura B. Stephens lbstephens@mintz.com  
Keith Teel kteel@cov.com  
Meredith R. Theisen mtheisen@rubin-levin.net, atty\_mtheisen@bluestylus.com;mralph@rubin-levin.net  
U.S. Trustee ustpregion10.in.ecf@usdoj.gov  
Susan Walker susan.walker@dentons.com  
Joshua D Weinberg jweinberg@goodwin.com  
Mark R. Wenzel mwenzel@salawus.com, pdidandeh@salawus.com  
Gabriella B. Zahn-Bielski gzahnbielski@cov.com

I further certify that on July 18, 2019, a copy of the foregoing *Notice of FrankGecker LLP's Statement for Services Rendered from May 28, 2019 through June 30, 2019* was served via electronic mail to the following:

United States Olympic Committee: Chris McCleary at [chrismccleary@usoc.org](mailto:chrismccleary@usoc.org)  
The Alexander, A Dolce Hotel and Wyndham Hotel Group LLC: Daniel M. Eliades at [daniel.eliaades@klgates.com](mailto:daniel.eliaades@klgates.com) and David S. Catuogno at [david.catuogno@klgates.com](mailto:david.catuogno@klgates.com)

and by U.S. Mail to:

USA Gymnastics  
130 E. Washington St., Ste. 700  
Indianapolis, IN 46204

/s/ Micah R. Krohn